

EXHIBIT A

From: Chris Wion [chrisw@calfoharrigan.com]
Sent: Wednesday, May 29, 2013 9:25 PM
To: Scola, Angela; RopesWashington1823-Microsoft_Motorola@ropesgray.com; Microsoft v Moto Breach of RAND Case; Summit1823@SummitLaw.com
Cc: MSFT-Motorola; Project-MS/Moto_WDWA_343/1823
Subject: RE: Microsoft v. Motorola (10-1823) -- Microsoft Expert Reports
Attachments: 5.29.13 Expert Report of Todd Menenberg.pdf; 05.29.13 Microsoft Rule 26(a)(2)(C) Disclosure David Killough.pdf

Counsel:

Attached please find the expert report of Todd Menenberg and the Rule 26(a)(2)(C) disclosure of David Killough.

CHRISTOPHER T. WION
CALFO HARRIGAN LEYH & EAKES LLP
999 THIRD AVENUE, SUITE 4400
SEATTLE, WA 98104
PHONE: 206-623-1700
FAX: 206-623-8717
chrisw@calfoharrigan.com

From: Scola, Angela [<mailto:ascola@Sidley.com>]
Sent: Wednesday, May 29, 2013 9:09 PM
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Cc: MSFT-Motorola; Project-MS/Moto_WDWA_343/1823
Subject: Microsoft v. Motorola (10-1823) -- Microsoft Expert Reports

Counsel:

Provided via the fileshare link below are the opening expert reports of Michael Orchard and Robert O'Hara. A password to access this link will follow separately.

<https://signin.sidleyfiletransfer.com/FS/v.aspx?v=8d6a68885967b6b8b3a0>

Sincerely,

Angela C. Scola | Legal Assistant
SIDLEY AUSTIN LLP | One South Dearborn Street | Chicago, Illinois 60603
Direct: (312) 456-5441 (x. 3-5441) | E-mail: ascola@sidley.com

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THE HONORABLE JAMES L. ROBART

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,
Plaintiff,
vs.
MOTOROLA, INC., et al.,
Defendants.

Case No. C10-1823-JLR

**MICROSOFT CORPORATIONS
FED. R. CIV. P. 26(a)(2)(C)
DISCLOSURE OF DAVID
KILLOUGH**

MOTOROLA MOBILITY LLC, et al.,
Plaintiffs,
vs.
MICROSOFT CORPORATION,
Defendants.

Plaintiff/Counterclaim Defendant Microsoft Corporation ("Microsoft"), by counsel, pursuant to Fed. R. Civ. P. 26(a)(2)(C), hereby discloses David Killough, Assistant General Counsel, Microsoft Corporation, as an expert witness under FRE 702.

Subject Matter on Which Mr. Killough Is Expected to Present Evidence. Mr. Killough will be testifying and will offer opinions regarding the attorneys' fees and other litigation costs and expenses Microsoft paid to Sidley Austin LLP, Calfo Harrigan Leyh &

MICROSOFT CORPORATION'S FED. R. CIV. P.
26(a)(2)(C) DISCLOSURE OF DAVID
KILLOUGH - 1

LAW OFFICES
CALFO HARRIGAN LEYH & EAKES LLP
999 THIRD AVENUE, SUITE 4400
SEATTLE, WASHINGTON 98104
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Eakes LLP, Freshfields Bruckhaus Deringer LLP, Boehmert & Boehmert, and Klarquist Sparkman LLP that Microsoft contends were incurred as a consequence of Defendants Motorola Mobility LLC, Motorola Solutions, Inc., and General Instrument Corporation's (collectively, "Motorola") breaches of contracts ("legal costs").

Summary of Facts and Opinions that Mr. Killough Is Expected to Offer. Mr.

Killough is expected to offer testimony regarding: (i) the amount of legal costs Microsoft paid; (2) that the legal costs were incurred in connection with Microsoft's defense of Defendants' claims that Microsoft infringed Standard-Essential Patents in actions before the International Trade Commission, various United States District Courts, and in Germany; (3) that the legal costs, including but not limited to the number of timekeepers, number of hours billed and hourly rates charged, were reasonable.

Expert Fee. Mr. Killough is not charging any fee for his testimony.

Microsoft reserves the right to supplement or amend this disclosure based on newly learned, changed, or additional information, as well as in accordance with the Court's orders.

DATED this 29th day of May, 2013.

CALFO HARRIGAN LEYH & EAKES LLP

By s/ Arthur W. Harrigan, Jr.
Arthur W. Harrigan, Jr., WSBA #1751

By s/ Christopher Wion
Christopher Wion, WSBA #33207

By s/ Shane P. Cramer
Shane P. Cramer, WSBA #35099
999 Third Avenue, Suite 4400
Seattle, WA 98104
Phone: 206-623-1700
arthurh@calfoharrigan.com
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1 By s/ T. Andrew Culbert
2 T. Andrew Culbert

3 By s/ David E. Killough
4 David E. Killough

5 MICROSOFT CORPORATION
6 1 Microsoft Way
7 Redmond, WA 98052
8 Phone: 425-882-8080
9 Fax: 425-869-1327

10 David T. Pritikin
11 Richard A. Cederroth
12 Constantine L. Trela, Jr.
13 William H. Baumgartner, Jr.
14 Ellen S. Robbins
15 Douglas I. Lewis
16 David C. Giardina
17 John W. McBride
18 David Greenfield

19 SIDLEY AUSTIN LLP
20 One South Dearborn
21 Chicago, IL 60603
22 Phone: 312-853-7000
23 Fax: 312-853-7036

24 Carter G. Phillips
25 Brian R. Nester

SIDLEY AUSTIN LLP
1501 K Street NW
Washington, DC 20005
Telephone: 202-736-8000
Fax: 202-736-8711

Counsel for Microsoft Corp.

CERTIFICATE OF SERVICE

I, Christopher Wion, swear under penalty of perjury under the laws of the State of Washington to the following:

1. I am over the age of 21 and not a party to this action.

2. On the 29th day of May, 2013, I caused the preceding document to be served on counsel of record in the following manner:

Attorneys for Motorola Solutions, Inc., and Motorola Mobility, Inc.:

Ralph Palumbo, WSBA #04751
Philip S. McCune, WSBA #21081
Summit Law Group
315 Fifth Ave. South, Suite 1000
Seattle, WA 98104-2682
Telephone: 206-676-7000
Email: Summit1823@summitlaw.com

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Steven Pepe (*pro hac vice*)
Jesse J. Jenner (*pro hac vice*)
Ropes & Gray LLP
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William Price (*pro hac vice*)
Brian Cannon (*pro hac vice*)
Andrea Pallios Roberts (*pro hac vice*)
Quinn Emanuel
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065-2139
MicrosoftvMotoBreachofRANDCase@quinnemanuel.com

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DATED this 29th day of May, 2013.

 s/ Christopher Wion
CHRISTOPHER WION

EXHIBIT B

From: Robbins, Ellen S. [erobbins@Sidley.com]
Sent: Wednesday, June 12, 2013 3:25 PM
To: Andrea P Roberts; microsoft-motorola@calfoharrigan.com; Project-MS/Moto_WDWA_343/1823; RopesWashington1823-Microsoft_Motorola@ropesgray.com; summit1823@summitlaw.com
Cc: Microsoft v Moto Breach of RAND Case
Subject: Re: Microsoft v. Motorola

Andrea,

Please be advised that Microsoft is withdrawing its Rule 26(a)(2)(C) expert disclosure of David Killough. Mr. Killough may still testify at the August 26 trial as a fact witness, but will not be offering expert opinions.

From: Robbins, Ellen S.
Sent: Wednesday, June 12, 2013 04:38 PM
To: 'andreaproberts@quinnemanuel.com' <andreaproberts@quinnemanuel.com>; 'microsoft-motorola@calfoharrigan.com' <microsoft-motorola@calfoharrigan.com>; Project-MS/Moto_WDWA_343/1823; 'RopesWashington1823-Microsoft_Motorola@ropesgray.com' <RopesWashington1823-Microsoft_Motorola@ropesgray.com>; 'summit1823@summitlaw.com' <summit1823@summitlaw.com>
Cc: 'MicrosoftvMotoBreachofRANDCase@quinnemanuel.com' <MicrosoftvMotoBreachofRANDCase@quinnemanuel.com>
Subject: Re: Microsoft v. Motorola

Andrea,

Please confirm that Dr. Haedicke speaks fluent English and that no translator will be needed at his deposition.

In addition, the address for Professor Haedicke's deposition, scheduled to begin at 9:00 AM Pacific Time on June 14, is:

Sidley Austin LLP
555 California Street
Suite 2000
San Francisco, CA 94104

Please let us know who will be attending so that we can give the names to building security. Thank you for your cooperation.

From: Andrea P Roberts [<mailto:andreaproberts@quinnemanuel.com>]
Sent: Friday, May 31, 2013 06:47 PM
To: Robbins, Ellen S.; microsoft-motorola@calfoharrigan.com <microsoft-motorola@calfoharrigan.com>; Project-MS/Moto_WDWA_343/1823; RopesWashington1823-Microsoft_Motorola@ropesgray.com <RopesWashington1823-Microsoft_Motorola@ropesgray.com>; summit1823@summitlaw.com <summit1823@summitlaw.com>
Cc: Microsoft v Moto Breach of RAND Case <MicrosoftvMotoBreachofRANDCase@quinnemanuel.com>
Subject: Microsoft v. Motorola

Ellen,

Dr. Haedicke is available for deposition on June 14 in Quinn Emanuel's San Francisco office. Dr. Leonard is available for deposition on June 24 in our San Francisco office. Please confirm that Microsoft will proceed on these dates. We are working on confirming a date for Holleman and will provide it shortly.

Please let us know when and where Microsoft's experts are available deposition.

Thanks,
Andrea

Andrea Pallios Roberts

Of Counsel,

Quinn Emanuel Urquhart & Sullivan, LLP

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EXHIBIT C

From: Robbins, Ellen S. [erobbins@Sidley.com]
Sent: Thursday, June 13, 2013 7:31 AM
To: Andrea P Roberts; microsoft-motorola@calfoharrigan.com; Project-MS/Moto_WDWA_343/1823; RopesWashington1823-Microsoft_Motorola@ropesgray.com; summit1823@summitlaw.com
Cc: Microsoft v Moto Breach of RAND Case
Subject: Re: Microsoft v. Motorola

Andrea,

Because we have withdrawn Mr. Killough's Rule 26(a)(2)(C) disclosure, there is no need for an expert deposition. Accordingly, we do not intend to proceed with Friday's deposition. With respect to any testimony Mr. Killough may offer at trial, as stated in our earlier email, he will be testifying as a fact witness and will not be offering any expert opinion testimony.

From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]
Sent: Wednesday, June 12, 2013 08:31 PM
To: Robbins, Ellen S.; 'microsoft-motorola@calfoharrigan.com' <microsoft-motorola@calfoharrigan.com>; Project-MS/Moto_WDWA_343/1823; 'RopesWashington1823-Microsoft_Motorola@ropesgray.com' <RopesWashington1823-Microsoft_Motorola@ropesgray.com>; 'summit1823@summitlaw.com' <summit1823@summitlaw.com>
Cc: Microsoft v Moto Breach of RAND Case <MicrosoftvMotoBreachofRANDCase@quinnemanuel.com>
Subject: RE: Microsoft v. Motorola

Ellen,

We are in receipt of your email withdrawing the Rule 26(a)(2)(C) disclosure of David Killough. Please confirm that, if he is permitted to testify at trial, Mr. Killough will not offer any testimony beyond facts to which he was a percipient witness and has personal knowledge, i.e. no expert or opinion testimony whatsoever. Specifically, please confirm that he will not offer testimony on the following:

- Any adoption or approval or analysis of the methodology used by Microsoft to allocate legal fees and costs to defending against Motorola's claims of infringement of its 802.11 and/or H.264 SEPs.
- Explanation of specific allocations of Sidley time entries, why they are purportedly correct, and the analysis performed by Ms. Robbins to determine each of said allocations
- Any testimony that Motorola's actions and/or alleged breach of contract caused any legal fees and costs to be incurred, and any attempt to calculate such legal fees and costs
- Any causal link between Motorola's alleged contract breaches and the amount of legal fees and costs incurred, e.g., as a result of Motorola sending the October 21 and October 29, 2010 offer letters, Motorola seeking injunctive relief in U.S. district courts, the ITC, and Germany for patent infringement, Motorola not entering into a license with Marvell, Motorola not issuing a license to Microsoft on the terms of Google's MPEG LA license.

Your email does not mention Mr. Killough's deposition. We therefore assume that he is still available for deposition on Friday and that Microsoft has not cancelled the deposition. If that is incorrect, please let us know so that we do not travel to Seattle unnecessarily.

Thanks,
Andrea

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Sent: Wednesday, June 12, 2013 3:25 PM
To: Andrea P Roberts; microsoft-motorola@calfoharrigan.com; Project-MS/Moto_WDWA_343/1823; RopesWashington1823-Microsoft_Motorola@ropesgray.com; summit1823@summitlaw.com
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Subject: Re: Microsoft v. Motorola

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555 California Street
Suite 2000
San Francisco, CA 94104

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Please let us know when and where Microsoft's experts are available deposition.

Thanks,
Andrea

Andrea Pallios Roberts
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Quinn Emanuel Urquhart & Sullivan, LLP

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EXHIBIT D

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Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF WASHINGTON

3
4 AT SEATTLE

5
6
7
8 MICROSOFT CORPORATION, a)

9 Washington corporation,)

10)
11 Plaintiff,)

12) No. 2-10-cv-

13 vs.) 01823-JLR

14)
15 MOTOROLA, INC., and MOTOROLA)

16 MOBILITY, INC.,)

17)
18 Defendants.)

19
20
21 VIDEOTAPED 30(b)(6) DEPOSITION OF DAVID KILLOUGH

22
23 May 6, 2013

24
25 Job No. CS1661676 Seattle, Washington

Veritext Corporate Services

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1 to H.264, and they -- you know, numbers of them just
2 typically were focused on those things.

3 And the same would be true for, you know, patents
4 that were declared essential to 801.11; there would
5 be some subset of folks that would spend, you know,
6 their time working on those, and might not do any
7 work on H.264 declared patents, for example.

8 That's the kind of, you know, specialization/
9 segregation of labor that I was thinking of.

10 Q Okay. And was that segregation of labor solely at
11 Sidley, or was that also at Harrigan and Michael
12 Best's firm?

13 A I typically think of it as it would be, you know,
14 Sidley with that kind of segregation.

15 Q Do you know the names of the attorneys who were
16 focused on the 802.11 standard-essential patents?

17 A No, I don't have a clear recollection as I sit here.

18 Q Do you know the names of the attorneys who were
19 focused on the H.264 standard-essential patents?

20 A Yeah. Certainly Doug Lewis was -- was one of them.

21 And I just don't have a clear recollection of
22 whether John McBride was principally H.264 or 801.11,
23 but there were, you know, several folks. I'm just --
24 just can't sort out in my mind who exactly was the --
25 you know, focusing on which bucket versus another

CONFIDENTIAL

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1 bucket of patents.

2 Q And to your knowledge, was there any -- any groups of
3 subsets of attorneys at Sidley focused on the '680
4 patent or the '582 patent asserted by Microsoft?

5 A Certainly there would have been attorneys that would
6 do just spadework and the due diligence necessary to
7 assert, you know, a patent. And I can't remember who
8 that may be. And they may have and expect would be
9 involved in other things, you know, as well and not
10 dedicated just to that.

11 It would seem to me to be unlikely that we had
12 anybody dedicated to the 699 counterclaims, the
13 patent aspects of those.

14 Q Okay. And to your knowledge, when you were speaking
15 about the people who were focused on the 802.11 and
16 H.264 patents, did those attorneys also work on other
17 aspects of the cases, or did they solely work on --
18 on those patents?

19 A I don't have a specific recollection. They may well
20 have worked on other patents as well and other
21 aspects of the case. I think that would be, in many
22 instances, likely that they didn't just do H.264 or
23 just 802.11 patents.

24 Q Are you aware of any documentation that breaks down
25 the different sets of attorneys at Sidley that had

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Page 121

1 allow you to make that finer allocation, did
2 Microsoft basically apply a general percentage rule
3 based on the patents in play at that time in the
4 case?

5 A One of two things would happen. It would either be
6 thrown out and not requested recovery at all. If --
7 if there wasn't enough information from the entry to
8 determine, then it would just be thrown out.

9 If the entry reflected, you know -- it was
10 clearly, for example, on the ITC 752 case, if it was
11 clearly an activity that, you know, could have
12 applied across the board to all patents, then, yes,
13 you apply the general rule.

14 Q Now, who -- who actually went through and did all the
15 allocations?

16 A For Sidley, I believe Ellen Robbins did.

17 Q Poor Ellen, all by herself?

18 A That's my understanding.

19 MS. ROBERTS: Sounds like fun.

20 MS. ROBBINS: True.

21 Q (By Ms. Roberts) Okay. And --

22 MS. ROBBINS: Let's repeat that
23 "poor Ellen" part again a little louder, to make
24 sure...

25 Q (By Ms. Roberts) So Ellen did the allocations.

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